

From: [Moore, Gary](#)
To: [Terry Andrews](#)
Subject: CES - TCEQ Frac Tanks
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Terry:

I was reviewing the analytical for the TCEQ Frac Tanks related to removing the stormwater from the residential neighborhood. It appears to me that the stormwater is not hazardous as defined by RCRA. The next determination is it a Class 1 or Class 2 Non-Hazardous Industrial Waste. For some reason, this is not very clear to me.

What is the differtiation between a class 1 and class 2? Class 3 is inert mateial which this is obvious not so Class 3 is out. I don't see a minimum concentration level that dictates if the material would be class 1 or class 2. It seems to go back to the RCRA classifications which makes no sense to me.

Can you explain?

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